Additional Questions based on April 12, 2013 Answers from USEPA-Region 5 to City of Kalamazoo Questions dated March 22, 2013

1. **Landfill Area**

   a. **What will be the estimated height of the new landfill area of approximately 45 acres if Alternative 2B is implemented? This estimate and associated drawings should be available or pursued if Alternative 2B is supposed to be a viable option for public acceptance.**

   b. **What impacts will the remediation efforts, both immediate and long-term, have on the Panelyte site? Will there be additional restrictions imposed on the Panelyte site as a result of implementing Alternative 2B?**

   c. **What is the current estimate of green space that would be available along Portage Creek if Alternative 2B is implemented? If public acceptance of Alternative 2B is desired, it seems that such estimates should be available prior to selection of the alternative. What signage would be posted along the disposal site fencing if Alternative 2B is implemented? What restrictions, if any, will be imposed on any trailway development along Portage Creek?**

2. **Panelyte Site**

   a. **The City was already aware of ongoing environmental concerns at the property. What options are available to move forward since a "comfort letter" appears to be unattainable?**

3. **Western Disposal Area**

   a. **The City will be re-reviewing the data that is in the Feasibility Study. A significant question the City has relates to a large mass of contaminated residuals remaining in contact with the groundwater in the consolidated disposal area if Alternative 2B is implemented. Even though the disposal area will be capped, groundwater will continue to flow through contaminated residuals and "vent" to Portage Creek. How will USEPA deal with ongoing PCB contamination that will occur as groundwater in contact with the contaminated residuals vents to Portage Creek? When PCB concentrations exceed acceptable levels, what treatment schemes will USEPA employ to ensure PCB contamination does not continue?**

The following statement is provided in item 3.a. in the response to the City on May 22, 2013: "Alternative 2B will prevent contaminated waste material at the OU1 landfill, including contamination in the WDA, from impacting groundwater and surface water." How specifically will Alternative 2B prevent contamination via venting groundwater into Portage Creek? What have studies at other similar "waste in place" disposal sites shown in regards to contaminated residuals remaining in contact with groundwater and any associated venting to surface water? Have such studies been conducted? Also, how will Alternative 2B prevent the contaminated waste from impacting the groundwater when portions of the contaminated waste already physically reside in the groundwater and will continue to be saturated with groundwater? This seems to be a contradictory statement since the contaminated waste will remain within the groundwater.

b. As noted above, City staff will be reviewing the Remedial Investigation data regarding these issues. Under 3.b.iv., there are a few questions: Can you please define "extensive" based on the response provided? In addition, how specifically did groundwater and soil investigations specifically show that waste (i.e., drums or barrels) had not been disposed of in the WDA?

4. b. The City appreciates a more responsive approach to the Cork Street Landfill issues. However, the City's specific suggestion from the March 12, 2013 meeting was to have numerous groundwater issues near the Allied Disposal Site coordinated by a single agency. This would include the current Strebor, Inc. site located immediately west of the Allied Disposal Site. Will such coordination be conducted to ensure the City is kept informed of activities/issues at such sites? Will the USEPA be coordinating such efforts? If sentinel wells are installed as part of Alternative 2B will such wells be physically located away from the Allied Disposal Site to ensure that there is adequate monitoring of any off-site migration? How will such wells be utilized to monitor other contaminated groundwater sites in the immediate area and will USEPA-Region 5 be coordinating any such monitoring and oversight?

5. Operational Costs

   b. Can the USEPA please expand upon this response? What are specific estimated annual projected costs for each of the first 5 years of operation of the Allied Disposal Site if Alternative 2B is selected? What rate of return on investment of the $3 million allocated to operation and maintenance was used to determine if this amount was adequate? Will the State of Michigan be required to supplement these funds if their investment strategy does not provide adequate ongoing funding for O & M costs? Is the State of Michigan required to keep these funds separate from other funds?

   e. If the remedy for the Allied Disposal Site proves to be ineffective (as determined by USEPA during their 5 year review) where would additional funding come from to take appropriate action? What if those funds are not available?

   f. The Lyondell Environmental Custodial Trust owns the former Allied Paper property south of Alcott Street. What happens if/when the Lyondell Environmental Custodial Trust runs out of money both in general and in their separate tax escrow account? What happens if the property cannot be sold, i.e., there is no willing buyer? What mechanisms are available if the Trust decides to walk away from the property?

There are some other general questions that have come up that the City would also like to have addressed.

1. Under the "Summary of Remedial Alternatives" provided to the City of Kalamazoo at the March 12, 2013 meeting, Alternative 3 ("Removal and Off-Site Disposal"), the estimated capital cost was listed as $366 million. This amount is close to $130 million more than the estimated capital cost previously provided ($238 million). What is the rationale behind such a large increase (over 50%) in Alternative 3? What specific issues have arisen that have caused this estimated cost to increase this significantly?

2. In discussions with The Environmental Quality Company (EQ), the City has been told that EQ has not been contacted by either USEPA-Region 5 or its consultant about Alternative 3 under the Summary of Remedial Alternatives. EQ owns and operates the closest TSCA landfill to the Allied Disposal Site and would likely be the selected repository for PCB waste excavated from the Allied Site. Why wasn't EQ consulted regarding potential costs associated with Alternative 3?

3. **The City of Kalamazoo has obtained a preliminary estimate of treatment costs associated with its Central Well Field in the event that the aquifer serving the well field should become contaminated with PCBs. Current 2013 estimated capital costs are approximately $3.4 million to provide treatment using activated carbon. If the City is in the position of needing to provide such treatment due to migration from the Allied Disposal Site, would Lyondell Environmental Custodial Trust and/or the USEPA-Region 5 be responsible for any such costs incurred by the City for such treatment?**

4. **It was indicated in the teleconference on Tuesday, April 16, 2013 that a database of similar situated sites as the Allied Disposal Site within USEPA-Region 5 will be provided. The City is very interested in reviewing these sites particularly in regards to public acceptance of the alternative(s) selected. One site that the City has become aware of is in St. Louis, Michigan called the "Velsichol Site". Any information that USEPA-Region 5 can provide regarding this particular site would be appreciated.**